AMBLER ASBESTOS PILES INDEX OF ADMINISTRATIVE RECORD

LEGAL ACTIONS

- 1. PADER Order issued February 19, 1974. P. 1-4.
- 2. Nicolet Appeal of February 19, 1974 PADER Order. P. 5-6.
- 3. PADER Order issued February 10, 1975. P. 7-9.
- 4. PADER Asbestos Monitoring Program Results March 1977. P. 10-64.
- 5. PADER Asbestos Monitoring Program Results October 1977. P. 65-85.
- 6. Study by University of Pennsylvania 1977. P. 86-247.
- 7. EPA Order issued June 30, 1976 NESHAPS violations. P. 248-254.
- 8. Sample results from inspection of June 2, 1983. P. 255-258.
- 9. Inspection report of 6/2/83. P. 259-338.
- 10. June 16, 1983 Memorandum from Van Cleve to all Environmental Services Divisions. P. 339-340.
- 11. Memorandum of "Drive-By" inspection of June 14, 1983, by Bruce Potoka. P. 341-341.
- 12. September 27, 1983, Sampling and Inspection Report. P. 342-345.
- 13. Memorandum from Bruce Potoka to file regarding September 27, 1983, inspection Sample Analysis Princeton Testing. P. 346-346.
- 14. Princeton Testing labs Sample Analysis. P. 347-355.
- 15. Sample Analyses Franklin Institute. P. 356-384.
- 16. Sample Analyses Kaselaan & D'Angelo. P. 385-430.
- 17. Chain of Custody Records for inspection of 12/8/83 and 12/9/83. P. 431-432.

- 18. Photographs (12) taken during September 27, 1983, inspection. P. 433-462.
- 19. Memorandum from Dr. Lybarger of the Center for Disease Control recommending the issuance of a Health Advisory regarding the asbestos piles. P. 463-466.
- 20. Memorandum by Bruce Potoka regarding delivery of sample analyses to Mr. Peter Heckman of Nicolet Incorporated. P. 467-467.
- 21. Request for emergency funding pursuant to the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA") and supporting documents from Bruce Potoka to Thomas Eichler, Regional Administrator. P. 468-468.
- 22. Request for emergency funding pursuant to CERCLA from Thomas Eichler, Regional Administrator, to William Hedeman, Director of the Office of Emergency & Remedial Response. P. 469-476.
- 23. December 8 and 9, 1983 Sampling and Inspection of Locust Street Playground area. Includes air and wipe samples. P. 477-478.
- 24. December 13, 1983, Letter to Mr. Bergman from Mr. Bruce Potoka regarding Mr. Bergman's failure to return calls concerning the Nicolet facility. P. 479-479.
- 25. Memorandum to Bruce Potoka regarding oral notification of Mr. Peter Hackman of Nicolet, Incorporated on December 16, 1983, that EPA would take action under CERCLA if Nicolet, Incorporated did not pursue cleanup alternatives. P. 480-480.
- 26. December 19, 1983, letter from Robert Mitkus, Director of Environmental Services Division, to Mr. Bergman of Nicolet, Incorporated confirming oral notice under Section 104 of CERCLA. P. 481-485.
- 27. Letter dated December 19, 1983, from Nicolet, Incorporated to Robert Mitkus, Director of the Environmental Services Division, regarding the EPA letter of December 19, 1983. P. 486-487.
- 28. Letter dated December 19, 1983, from William Hedeman to Lee Thomas authorizing funding under CERCLA.
 P. 488-492.

- 29. Memorandum by Bruce Potoka regarding December 21, 1983, meeting between EPA and Nicolet, Incorporated. P. 493-493.
- 30. Memorandum by Mr. Timothy Travers regarding hand delivery of draft Consent Decree to Nicolet, Incorporated on December 22, 1983. P. 494-494.
- 31. Letter dated December 23, 1983, from Albert Slapp, Esquire to Joseph Melvin regarding Mr. Slapp's representation of Nicolet, Incorporated. P. 495-496.
- 32. Draft Consent Order. P. 497-502.
- 33. Draft Unilateral Order. P. 503-512.
- 34. Comments from EPA Headquarters regarding Draft Unilateral Order. P. 513-514.
- 35. Memorandum from Gene Lucero, EPA Headquarters, concurring on the issuance of a unilateral order. P. 515-515.
- 36. Memorandum by Neil Wise, Esquire, Chief of the Solid Waste and Emergency Branch regarding the January 5, 1984, meeting between Nicolet, Incorporated and EPA. P. 516-518.
- 37. January 6, 1984, memorandum by Bruce P. Smith, Chief of the Environmental Emergency Branch to Thomas Eichler, Regional Administrator, regarding the January 5, 1984, meeting between Nicolet, Incorporated and EPA. P. 519-519.
- 38. Unilateral Order issued to Nicolet, signed by Thomas Eichler, Regional Administrator on January 9, 1984. P. 520-527.
- 39. Memorandum by Bruce P. Smith, Chief of the Environmental Emergency Branch regarding the January 11, 1984, meeting between Nicolet, Incorporated and EPA. P. 528-529.
- 40. Letter of Agreement from Albert Slapp, Esquire to Thomas Eichler, Regional Administrator. P. 530-532.
- 41. Presidential Order delegating the Administrator of EPA the authority to enforce Section 106 of CERCLA.

- P. 533-536.
- 42. Delegation of Authority from the Administrator of EPA to the Regional Administrators to issue Administrative Orders under Section 106 of CERCLA. P. 537-537.
- 43. Memorandum from Janet Luffy, Office of Public Affairs, to file regarding notification of PADER of the issuance of an Administrative Order. P. 538-538.
- 44. Memorandum from Dr. William I. Nicholson of Mt. Sinai Environmental Lab regarding threat posed by piles. P. 539-540.
- 45. Memorandum from Dr. Edwin C. Holstein of Mt. Sinai Environmental Lab regarding imminent hazard posed by piles. P. 541-549.
- 46. Letter from Borough of Ambler and Police Report regarding dumping incident on February 27, 1984. P. 550-552.
- 47. Letter from Rohm and Haas regarding substance used to stabilize the pile dated February 27, 1984. P. 553-553.
- 48. Access Order signed March 14, 1984, and cover letter withdrawing Order signed January 9, 1984. P. 554-563.
- 49. Memorandum of Janet Luffy, Office of Public Affairs of EPA, regarding notification of PADER of the issuance of an Administrative Order. P. 564-564.
- 50. Memorandum of Gene A. Lucero, Director, Office of Waste Programs Enforcement, EPA, concurring in the issuance of the EPA Order. P. 565-565.

AMBLER ASBESTOS PILES OU1 (CONTINUATION OF) ADMINISTRATIVE RECORD * ** *** INDEX OF DOCUMENTS

DOCUMENT NO. <u>SITE IDENTIFICATION</u> Background

- 1 1) Memorandum to Mr. Orterio Villa, Jr. from the Staff Engineer re: Sampling Wissahickon Creek in the Vicinity of Nicolet and CertainTeed Asbestos Plants, 7/26/74. P. 566-567. Wissahickon Creek Special Study is attached to the memorandum.
- 2 2) Report: <u>Possible Health Hazards of Asbestos Waste</u>
 <u>Pile: Ambler, Pennsylvania</u>, by Mr. George K. Tekuhata, et al, 8/75. P. 568-600.
- 3 3) Memorandum to Mr. Leland Marshall from Mr. Abraham Ferdas re: Meeting with DER-Asbestos Piles, 4/20/76. P. 601-602.
- 4 4) Memorandum to Mr. Lee Marshall from Mr. Stephen Copeland re: National Emissions Standards for Hazardous Air Pollutants (NESHAPs) programs, 4/22/76. P. 603-604.
- 5 5) Letter to Mr. Peter Taft from Mr. Daniel J. Snyder re: Disposal of asbestos waste under Section 112 of the Clean Air Act (NESHAPs), 5/12/76. P. 605-606.
- 6 6) Report: The Results of an Ambient Air Asbestos
- * An Administrative Record of this site was prepared by the EPA in March 1984. The index of those documnets is attached and can be found in Volumes I and II.
- ** Supporting Sampling Data is located at the EPA III Central Regional Laboratory in Annapolis, Maryland.
- *** Administrative Record updated 5/21/90 and 8/21/97.

- Monitoring Program in the Vicinity of an Inactive Refuse Pile in Ambler, Pennsylvania, by Equitable Environmental Health, Inc., 10/77. P. 607-644.
- 7 7) Memorandum to Mr. Ben Mykijewycz from Mr. Dave O'Brien re: Asbestos NESHAPs Inspection of Nicolet, 8/4/83. P. 645-645.
- 8 Memorandum to Mr. Ben Mykijewycz from Mr. Steve Copeland re: Asbestos NESHAPs reinspection of Nicolet, Inc., 10/11/83. P. 646-647.

Preliminary Assessment/Site Inspection Reports

- 9 1) Potential Hazardous Waste Site Identification and Preliminary Assessment, 5/5/81. P. 648-658.
- 10 2) Letter to Ms. Linda Boornazian from Ms. Marcia L. Irwin and Mr. Don Senovitch re: Transmittal of a Final Preliminary Assessment of Valley Forge National Park Service, 6/16/83. P. 659-664. A Potential Hazardous Waste Site Identification and Preliminary Assessment is attached to the letter.
- 11 3) Report: <u>Site Inspection of Ambler Asbestos Pile,</u> <u>prepared under TDD No. F3-8305-71</u>, prepared by NUS, 5/1/84. P. 665-749.

DOCUMENT NO. REMEDIAL ENFORCEMENT PLANNING PRP Search Correspondence

- 12 1) Letter to Mr. Bernard Bergman from Mr. Stephen Wassersug re: Offer to conduct Remedial Investigation/Feasibility Study, 2/22/85. P. 750-752.
- 13 2) Letter to Mr. J.P. McGinley from Mr. Stephen R. Wassersug re: 104(e) information request, 11/26/85. P. 753-755.
- 14 3) Letter to Mr. Albert Slap from Mr. Hector Abreu-Cintron re: Playground area located near the Ambler Asbestos Site, 9/12/85. P. 756-757.
- 15 4) Letter to Mr. James Cossaboon from Mr. Stephen Wassersug re: Notice letter opportunity to conduct a Focused Feasibility Study, 5/22/87. P. 758-804.
- 16 5) Letter to Mr. Hector M. Abreu-Cintron from Mr. Paul Diamond re: Response to 5/22/87 letter, 6/11/87. P. 805-806.
- 17 6) Letter to Mr. J.P. McGinley from Mr. James Seif re: Special notice letter, 7/24/87. P. 807-809.

Draft Orders

18 1) Draft Consent Order Remedial Investigation/Feasibility Study for Nicolet, 8/11/86. P. 810-823.

Signed Orders

19 1) Administrative Order by Consent for Field Data Collection in the matter of Ambler Asbestos Site CertainTeed Pile, Docket No. III 88-15-DC, 12/30/87. P. 824-838.

DOCUMENT NO. REMEDIAL RESPONSE PLANNING Work Plans

- 20 1) Report: Work Plan Memorandum for Ambler Asbestos Pile, Remedial Investigation/Feasibility Study, prepared by Camp, Dresser and McKee, Inc., 5/31/85. P. 839-911.
- 21 2) Report: Project Operations Plan for Ambler Asbestos
 Piles Site, Remedial Investigation/Feasibility Study,
 prepared by Camp, Dresser & McKee, Inc., 2/18/86.
 P. 912-1092.
- 22 3) Report: Final Work Plan for Ambler Asbestos Pile Site, Ambler, Pennsylvania, Remedial Investigation/
 Feasibility Study, Vol. I, prepared by Camp, Dresser and Mckee, 6/5/86. P. 1093-1254.
- 4) Memorandum to Mr. Tim Travers from Mr. Frank J. Finger re: Transmittal of a report, 12/23/86. P. 1255-1443. Report: Project Operations Plan for Ambler Asbestos Piles Site, Remedial Investigation/Feasibility Study, Vol. I, is attached to the memorandum.

<u>Health Risk/Endangerment Assessment</u>

- 24 1) Letter to Mr. Charles Walters from Mr. Edward J. Heimel re: Re-opening of the Locust Street Playground, 2/27/84. P. 1444-1445. A memorandum regarding playground equipment is attached to the letter.
- 25 2) Memorandum to Mr. Charles Walters from the Chief, Superfund Implementation Group re: Transmittal of comments on Nicolet Asbestos Site from the Center for Environmental Health, Centers for Disease Control, 6/18/84. P. 1446-1455. Comments and Maps are attached to the memorandum.
- 26 3) Memorandum to Mr. Charles Walters from Mr. Robert Marguccio re: Transmittal of Locust Street Playground Bulk Sample Results, 10/5/84. P. 1456-1478. Sample results are attached to the memorandum.
- 27 4) Memorandum to Mr. Charles J. Walters from the Chief, Superfund Implementation Group re: Discussion of the Ambler Residential Sampling Protocol, 3/14/85.
 P. 1479-1479.
- 28 5) Memorandum to Mr. Charles J. Walters from the Chief,

Superfund Implementation Group re: A review of data by the Chronic Disease Division, Center for Environmental Health, 5/2/85. P. 1480-1481.

- 29 6) Letter to Mr. Bucky Walters from Mr. Edward J. Heimel re: Review of residential sampling for Ambler, 6/11/85. P. 1482-1492. An analysis of eight Air Samples is attached to the letter.
- 30 7) Letter to Ms. Francine Carlini from Mr. Edward J. Heimel re: Daily account of asbestos detection, 8/13/85. P. 1493-1494.
- 31 8) Memorandum to Mr. Charles Walters from Chief, Superfund Implementation Group re: Nuisance control at the site, 9/4/85. P. 1495-1495.
- 32 9) Letter to Mr. Phil Retallick from Mr. Edward J. Heimel re: A case of airborne asbestos, 9/6/85. P. 1496-1497. A letter regarding fall-out of asbestos is attached.

Correspondence

- 33 1) Report: <u>Existing Information Memorandum/Initial Site</u>
 Evaluation Report, 7/85. P. 1498-1551.
- 34 2) Memorandum to Mr. Hector Abreu [sic] from Mr. Frank J. Finger re: Transmittal of a Table of "Asbestos Disease Landmarks and Regulatory Action in the United States," and chronology of other major federal actions related to asbestos, 2/4/86. P. 1552-1559. A chronology is attached to the memorandum.
- 35 3) Letter to Mr. Edward Heimel from Mr. Hector M. Abreu-Cintron re: Grass-cutting at Nicolet facilityplayground area, 5/86. P. 1560-1561. A letter regarding the playground area near Ambler Asbestos site is attached to the letter.
- 36 4) Memorandum to the file from Mr. Hector M. Abreu-Cintron re: Trip Report CertainTeed Pile Sampling, 5/12/86. P. 1562-1562.
- 37 5) Letter to Mr. Richelle Hittenger from Ms. Carol L. Stokes re: Grass-cutting at Nicolet facility-

- playground area, 5/29/86. P. 1563-1563.
- 38 6) Letter to Mr. Bernard Bergman from Mr. Stephen R. Wassersug re: Nicolet's interest in conducting the Remedial Investigation and Feasibility Study, 6/10/86. P. 1564-1566.
- 39 7) Letter to Ms. Margaret L. Hutchinson from Mr. Joel Schneider re: Nicolet's response to Mr. Wassersug's June 10, 1986 letter, 7/11/86. P. 1567-1569.
- 40 8) Letter to Ms. Margaret L. Hutchinson from Mr. Joel Schneider re: Outline of the Preliminary Work Plan, 7/22/86. P. 1570-1578. The Preliminary Work Plan is attached to the letter.
- 41 9) Letter to Ms. Margaret L. Hutchinson from Mr. Joel Schneider re: Proposed work at the Nicolet site, 7/23/86. P. 1579-1580.
- 42 10) Letter to Ms. Margaret L. Hutchinson from Mr. Joel Schneider re: Nicolet's proposed work plan for the Remedial Investigation/Feasibility Study, 8/4/86.
 P. 1581-1606. The proposed work plan is attached to the letter.
- 43 11) Letter to Mr. Joel Schneider from Ms. Virginia Gibson-Mason re: Concerns about the work plan submitted by the EPA, 8/18/86. P. 1607-1608.
- 12) Letter to Ms. Carol Stokes from Mr. Frank J. Finger, III re: Review of the Remedial Investigation/ Feasibility study, 8/20/86. P. 1609-1611.
- 45 13) Letter to Ms. Virginia Gibson-Mason from Mr. Joel Schneider re: Government rejection of the proposed work plan, 8/22/86. P. 1612-1613.
- 46 14) Letter to Ms. Virginia Gibson-Mason from Mr. Joel Schneider re: Technical comments in response to EPA's proposed work plan, 8/28/86. P. 1614-1623. The technical comments are attached to the letter.
- 47 15) Letter to Ms. Carol Stokes-Cawley from Mr. F.J. Finger re: Response to Ambler review of the REM II Work Plan, 9/26/86. P. 1624-1626.
- 48 16) Letter to Ms. Virginia Gibson-Mason from Mr. Joel

Schneider re: Nicolet's comments on the proposed work plan, 10/1/86. P. 1627-1633. The technical comments are attached to the letter.

- 49 17) Letter to Mr. Joel Schneider from Ms. Lydia Isales re:
 Meeting regarding the Remedial Investigation/
 Feasibility Study, 10/3/86. P. 1634-1635.
- 50 18) Letter to Mr. John C. Ulfelder from Mr. Kenneth Eisenberg re: Vitrifix pilot project, 10/24/86. P. 1636-1674. The following are attached to the letter:
 - a. an agenda;
 - b. a letter regarding the Vitrifix process;
 - c. a protocol;
 - d. two letters regarding the Vitrifix process; and
 - e. a report on the Vitrifix process.
- 51 19) Handwritten notes re: Meeting with Vitrifix of North America, Inc., 11/4/86. P. 1675-1684. A report entitled "The Vitrifix Process Method Statement" is attached to the handwritten notes.
- 52 20) Letter to Ms. Carol Stokes-Cawley from Mr. Kenneth S. Eisenberg re: Presentation of objectives from November 4, 1986 meeting, 11/7/86. P. 1685-1687.
- 53 21) Letter to Mr. Kenneth S. Eisenberg from Mr. Bruce P. Smith re: Vitrifix's proposal to conduct a pilot project at the Ambler Asbestos Site, 12/30/86. P. 1688-1688.
- 54 22) Letter to Mr. Bernard Bergman from Mr. Kenneth Eisenberg re: Vitrifix process, 3/6/87. P. 1689-1690.
- 55 23) Letter to Mr. Joel Schneider from Ms. Lydia Isales re: Transmittal of a Field Activity Summary Report, 7/28/87. P. 1691-1714. A Report: Field Activity Summary is attached to letter.
- 56 24) Letter to Mr. Paul S. Diamond from Mr. Bruce P. Smith re: CertainTeed Meeting on July 28, 1987, 8/10/87. P. 1715-1717.
- 57 25) Excerpt from a report by Environmental Resources Management, Inc. (undated). P. 1718-1724.

58 26) Letter to Mr. Edward T. Bresnan from Mr. Stanley L. Laskowski, U.S. EPA, re: Response to Mr. Edward T. Bresnan's letter dated, September 23, 1988, 9/30/88. P. 1725-1727.

Record of Decision

59 1) Record of Decision, 9/30/88. P. 1728-1830.

Five-Year Report

1) Report: <u>Five-Year Review Report</u>, <u>Ambler Asbestos Piles</u>, <u>Superfund Site</u>, prepared by U.S. EPA, 5/27/97.
P. 1830A-1830F.

DOCUMENT NO. EMERGENCY REMOVAL RESPONSE PROJECTS Technical Documents and Correspondence

- 60 1) Report: <u>Water Filtration for Asbestos Fiber Removal</u>, prepared by Mr. Gary S. Logsdon, 12/79. P. 1831-1848.
- 61 2) Letter to Mr. John Arpin from Mr. James F. McVeigh re:
 Results of a series of air monitoring tests, 2/5/81.
 P. 1849-1849.
- 62 3) Report: <u>Battelle Columbus Laboratories' Tests for the Evaluation of Sealants for Encapsulation of Friable Asbestos-Containing Materials</u>, prepared by Mr. Julius Brodsky, 3/9/81. P. 1850-1850.
- 63 4) Letter to Mr. Rodger Rassignal from Mr. Edward S. Lahaye re: Use of Asbestite 1000 as wetting agent for the removal of asbestos material, 3/5/82. P. 1851-1855.
- 64 5) Letter to Mr. John Arpin from Mr. John Verbeeck re:
 Major removal of Asbestos from two vessels, 12/15/82.
 P. 1856-1856.
- 65 6) Letter to Mr. Joseph Melvin from Mr. John F. Gaffrey re: Letter from the Borough of Ambler regarding clean up, 2/9/84. P. 1857-1858.
- Memorandum to Nicolet Asbestos Pile file from Mr. Ed Heimel re: December 20, 1983 meeting, 2/15/84. P. 1859-1861.
- 67 8) Letter to Mr. Edward J. Heimel from Mr. Bernard S. Bergman re: Agreement between Nicolet and EPA, 2/17/84. P. 1862-1863.
- 68 9) Letter to Mr. Bucky Walters from Mr. Edward J. Heimel re: Concerns about the possible re-opening of the Locust Street Playground, 2/27/84. P. 1864-1864.
- 69 10) Letter to Mr. Bruce Potoka from Mr. Edward J. Home re: Letter from the Borough of Ambler requesting a grant, 3/9/84. P. 1865-1866.
- 70 11) Letter to Mr. Bruce Potoka From Ms. Cindy A. Gouck re: Use of the asbestos product by EPA, 3/29/84. P. 1867-1867.
- 71 12) Letter to Mr. Albert J. Slap from Mr. Joseph J. Melvin

- re: EPA's review of the clean up action at the Nicolet site, 4/2/84. P. 1868-1869.
- 72 13) Letter to Mr. Joseph Melvin from Mr. Albert J. Slap re:
 Nicolet's proposed clean up action plans, 4/4/84.
 P. 1870-1887. A report on the proposed clean-up action plans and a report on Ambler Asbestos Tailing Pile are attached to the letter.
- 73 14) Mailgram to Mr. Thomas P. Eichler from Mr. Albert J. Slap re: Judge Newcomer's verbal order to the EPA to stop spending public funds at the Nicolet facility, 4/9/84. P. 1888-1888.
- 74 15) Desk Memorandum to Mr. Jeff Pike from Mr. Ed Bender re:
 Transmittal of general permit for bank stabilization
 and application for dam or water obstruction permit,
 4/11/84. P. 1889-1896. General Permit and Application
 for Dam or Water Obstruction Permit are attached to the
 memorandum.
- 75 16) Letter to Mr. Thomas P. Eichler from Mr. Albert J. Slap re: Order to EPA to cease spending public funds on Nicolet site, 4/16/84. P. 1897-1899.
- 76 17) Mailgram to Mr. Thomas P. Eichler from Mr. Albert J. Slap re: Nicolet's response to Judge Newcomer's verbal order, 4/17/84. P. 1900-1900.
- 77 18) Mailgram to Mr. Thomas P. Eichler from Mr. Albert J. Slap re: Nicolet's protest against EPA's illegal activities on Nicolet's business premises, 4/18/84. P. 1901-1901.
- 78 19) Letter to Mr. Albert J. Slap from Mr. Sheldon M. Novick re: Communications with Mr. Tom Eichler, 4/19/84. P. 1902-1902.
- 79 20) Report: <u>Scanning Electron Microscopy Analysis, Ambler Asbestos Tailing Piles</u>, prepared by Kaselaan & D'Angelo Associates, Inc., 4/27/84. P. 1903-1931.
- 80 21) Letter to Mr. Bruce Beitler from Mr. Jeff Pike re: Transmittal of requested materials, 4/30/84. P. 1932-1934. An Erosion and Sedimentation Plan is attached to the letter.
- 81 22) Letter to Mr. Sheldon Novick from Mr. Albert J. Slap re: Comments on EPA's actions, 4/30/84. P. 1935-1935.

- 82 23) Letter to Mr. Dave Corl from Mr. Jeffrey Pike re: The covering of slopes along the Wissahickon Creek, and some Creek bank stabilization, 5/1/84. P. 1936-1936.
- 83 24) Memorandum to Mr. Lee M. Thomas from Mr. Thomas P. Eichler re: Additional funding request for immediate removal at the Ambler Asbestos Tailing Site, 5/2/84. P. 1937-1947.
- 25) Letter to Mr. Jeff Pike from Ms. Cindy A. Gouck re: Use of Asbestite 3000, 5/2/84. P. 1948-1949.
- 85 26) Letter to Mr. Edward Bender from Mr. Jeff Pike re:
 General Permit-3, Bank Rehabilitation and Protection at
 the Ambler Asbestos Site, 5/9/84. P. 1950-1955.
 Application for Dam or Water Obstruction Permit and
 drawings of proposed bank stabilization plan are
 attached to the letter.
- 86 27) Letter to Mr. Patrick Zollo from Mr. Jeffrey Pike re:
 Notice to Upper Dublin Township on Stream Bank
 Stabilization, 5/11/84. P. 1956-1956.
- 87 28) Letter to Mr. Jeff Pike from Mr. Edward Bender re: Use of General Permit No. 3, Bank Rehabilitation, and Stabilization along the Wissahickon Creek, 5/14/84. P. 1957-1958.
- 88 29) Letter to Mr. Jeff Pike from Mr. Edward J. Heimel re: Finalization of items before EPA withdraws from the Ambler Site, 5/22/84. P. 1959-1960.
- 89 30) Memorandum to Mr. Stephen Margolis from a medical epidemiologist, re: Air Sampling results, 6/11/84. P. 1961-1969. Tables and diagrams are attached to the memorandum.
- 90 31) Report: Erosion and Sedimentation Control Concepts for the Ambler Asbestos Tailings Pile, CERCLA Immediate
 Removal Action, prepared by Region III TATM, 6/15/84.
 P. 1970-1980.
- 91 32) Report: <u>Erosion & Sedimentation Control Concepts for Ambler Asbestos Tailings Pile</u>, Locust Street (no author cited), 6/15/84. P. 1981-1987.
- 92 33) Handwritten Report: Drainage, Erosion and Sedimentation Control Concepts (no author cited), 6/19/84. P. 1988-1994.

- 93 34) Site Visit Notes, 6/22/84. P. 1995-1997.
- 94 35) Memorandum to Mr. Richard Habrukowich from Mr. Bill Zahn re: Review of Drainage Erosion and Sedimentation Control Concepts, 6/27/84. P. 1998-2009. Illustrations of the Concepts are attached to the memorandum.
- 95 36) Letter to Mr. Thomas P. Eichler from Mr. Albert J. Slap re: EPA's failure to advise Nicolet of proposed action, 6/29/84. P. 2010-2011.
- 96 37) Letter to Mr. Joseph Melvin from Mr. Albert J. Slap re: Severe erosion at the Nicolet site, 8/6/84. P. 2012-2014.
- 97 38) Memorandum to Mr. Jeff Pike from Mr. Rodney D. Turpin re: Residential Sampling Plan, 8/24/84. P. 2015-2018. Sampling Plan is attached to the memorandum.
- 98 39) Memorandum to Mr. Jeffrey Pike from Mr. Thomas P. Eichler re: Additional funding request and exemption from 6 month limit, 9/6/84. P. 2019-2024.
- 99 40) Memorandum to Mr. Jeffrey Pike from Mr. Rodney D. Turpin re: Ambler Asbestos residence sampling, 11/29/84. P. 2025-2027.
- 100 41) Report: Sample Profile Report Ambler Asbestos Piles
 Site, by Techlaw, Inc. Regional Evidence Audit Contact
 Team, 11/86. P. 2028-2300. A letter regarding the
 Ambler Asbestos Piles Site Auditor's memo is attached
 to the report.
- 101 42) Permanent Warranty for Arpin Products signed by Mr. John B. Arpin, (undated). P. 2301-2308. Application instruction and specifications are attached to the warranty.
- 102 43) Handwritten notes on capping specification, (undated). P. 2309-2311.

Operational Documents

103 1) Site/Safety Protocal, Ambler Trailings Piles, 3/84. P. 2312-2316.

104 2) Letter to Mr. Patrick Zollo from Mr. Jeff Pike re:
U.S. Environmental Protection Agency Immediate Removal
Action, 5/11/84. P. 2317-2318.

On-Scene Coordinator's Report

105 1) Report: Federal On-Scene Coordinator's Report, Ambler Asbestos Waste Tailings Piles, prepared by Mr. Jeffery Pike, 3/26/84 to 5/21/85. P. 2319-2709.

DOCUMENT NO. COMMUNITY INVOLVEMENT Imagery

106 1) Aerial photographs of the site are available for review at the EPA Region III offices.

Congressional Correspondence

- 107 1) Memorandum to Ms. Debbie Nash, P. Schrecongost [sic] and Voltaggio [sic] from Honorable Arlen Specter re: Preparation of response for Regional Administrator's signature, 6/5/84. P. 2710-2714. The following are attached to the memorandum:
 - a) a letter addressing concerns raised by Mr. Heimel;
 - b) a letter addressing questions from the Borough; and
 - c) a letter of transmittal of correspondence.
- 108 2) Letter to Honorable John Heinz from Mr. Thomas Eichler re: Project to eliminate health threat posed by Asbestos tailings, 7/2/84. P. 2715-2716. A letter submitting correspondence for review is attached to the letter.
- 109 3) Memorandum to Ms. Kim Lonasco, Schrecongost [sic] and Smith [sic] from Honorable Arlen Specter and Honorable John Heinz re: Preparation of response for Regional Administrator's signature, 1/21/86. P. 2717-2721. Letters regarding the Vitrifix process for remediating the asbestos piles are attached to the memorandum.

Community Relations Plans

110 1) Report: <u>Draft Community Relations Plan for the Ambler Asbestos Site</u>, prepared by Camp, Dresser & McKee, Inc., 2/6/86. P. 2722-2747.

Fact Sheets, Press Releases, Public Notices

- 111 1) Fact Sheet, 9/3/86. A meeting agenda is attached to the fact sheet. P. 2748-2750.
- 112 2) Fact Sheet, Ambler Asbestos Piles (undated). P. 2751-

Meeting Summaries, Trip Reports, Correspondence with the Public

- 113 1) Public Meeting sign-in sheet, 4/3/84. P. 2752-2755. A fact sheet entitled: Information on Home Sampling by EPA for Asbestos, a public health advisory, and a letter raising concerns about cancer-causing agents are attached to the sign-in sheet.
- 114 2) Memorandum to Mayor Heayn from Mr. Heimel re: questions raised by the EPA workplan, 8/4/86. P. 2756-2765.
- Nicolet's Public statement to be read at September 3, 1986 Public Meeting, 9/3/86. P. 2766-2766.
- 116 4) Letter to Mr. Edward Heimel from Ms. Lydia Isales re: Grass cutting at Nicolet facility-playground area, 9/18/86. P. 2767-2767.
- 117 5) Letter to Mr. Edward Heimel from Ms. Carol Stokes-Cawley re: Transmittal of response to August 4, 1986 memo, 10/14/86. P. 2768-2784. A memorandum regarding questions raised by Mr. Ed Heimel and a Superfund Record of Decision update are attached to the letter.

Interagency Meeting Notes and Correspondence

- 118 1) Letter to Mr. Bruce Potoka from Mr. Edward Heimel re: Request for grant to fulfill requirements of the community participation efforts in Superfund, 3/9/84. P. 2785-2786.
- 119 2) Notice to the residents of South Ambler from Mr. Edward Heimel, re: Progress of EPA in covering up the asbestos piles, 3/28/84. P. 2787-2787.
- 120 3) Letter to Mr. Jeff Pike from Mr. Edward Heimel re: Complaint about dirt washing into residents' yards, 7/27/84. P. 2788-2788.
- 121 4) Letter to Mr. Thomas P. Eichler from Mr. Edward J. Heimel re: Request for closer participation between EPA and citizens of Ambler, 5/7/85. P. 2789-2790.

- 122 5) Letter to Mr. Hector Abreu-Cintron from Mr. Edward J. Heimel, re: Testing the playground for usage in South Ambler, 1/29/86. P. 2791-2791.
- 123 6) Letter to Mr. Bernard Bergman from Mr. Hector Abreu-Cintron, re: Testing of playground on Chestnut Street, 2/11/86. P. 2792-2792.
- 124 7) Memorandum to the file from Ms. Carol Stokes-Cawley re:
 Public and Borough meeting to present Remedial
 Investigation/Feasibility Study Workplan for Ambler,
 9/15/86. P. 2793-2801. Memoranda regarding Ambler
 Asbestos Workplan and Superfund Record of Decision
 Update are attached to the memorandum.
- 125 8) Letter to Ms. Marge Cathey from Ms. Nanci Sinclair re:
 Misunderstanding from conversation of November 1
 (undated). P. 2802-2802.

DOCUMENT NO. LEGAL ACTIONS Litigation

- 126 1) Complaint in Nicolet, Inc. v. Eichler, 1/17/84. P. 2803-2814.
- 127 2) EPA Answer and Counterclaim filed in Nicolet, Inc. v. Eichler, 3/19/84. P. 2815-2832.
- Order issued by District Court for the Eastern District of Pennsylvania, re: Enforcement of EPA's March 16, 1984 administrative order, 3/26/84. P. 2833-2835.
- 129 4) Third Circuit Court of Appeals Order denying Nicolet, Inc.'s a Motion for injunction pending appeal dated, 3/30/84. P. 2836-2837.
- 130 5) Letter to Mr. Albert J. Slap from Mr. Joseph J. Melvin re: proposed consent decree, 4/11/84. P. 2838-2845. The consent decree is attached to the letter.
- 131 6) Third Circuit Court of Appeals Order dismissing Nicolet's appeal for lack of jurisdiction, 1/4/85. P. 2846-2847.
- 132 7) Order issued by the District Court for the Eastern District of Pennsylvania, re: Nicolet's motion for reconsideration or for an injunction pending appeal, 8/5/85. P. 2848-2848.
- 133 8) Third Circuit Court of Appeals Order affirming the district court judgement, 3/27/86. P. 3849-2850.

DOCUMENT NO. SITE SPECIFIC GUIDANCE DOCUMENTS

- 134 1) "Movement of selected Metals, Asbestos and Cyanide in Soil: Applications to Waste Disposal Problems" by U.S. EPA, 4/77. P. 2851-2853.
- 135 2) "Field Monitoring of Chrysolite Asbestos in California Waters" by Mr. Steven B. Hayward, 3/84. P. 2854-2862.
- 136 3) "Electrical Technique for In-Place Stabilization of Contaminated Soils" in Chemical Engineering Progress, 3/85. P. 2863-2870.